

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PATRICIA A. McDONOUGH,

Plaintiff,

- against -

JPMORGAN CHASE BANK, N.A., successor  
in interest to THE CHASE MANHATTAN BANK,  
JPMORGAN CHASE & CO., JPMORGAN  
CHASE & CO. d/b/a JP MORGAN CHASE, N.A.,

Defendants.

ECF

08 Civ. 4429 (JSR) (FM)

**DEFENDANTS' RULE 26  
DISCLOSURE STATEMENT**

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Defendants JPMorgan Chase Bank, N.A. (the "Bank"), successor in interest to The Chase Manhattan Bank, JPMorgan Chase & Co. ("JPMC"), JPMorgan Chase & Co. d/b/a JP Morgan Chase Bank, N.A., by their attorneys, JPMorgan Chase Legal and Compliance Department, Frederic L. Lieberman, Assistant General Counsel, as and for their disclosure pursuant to Fed. R. Civ. P. 26, asserts as follows:

A. The name and, if known, the address and telephone number of each individual other than Plaintiff likely to have discoverable information that the disclosing party may use to support its claims or defenses:

<u>Name</u>	<u>Address</u>
Dennis Robertson	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, NY 10081 (212) 552-1815
James Caruso	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, NY 10081 (212) 552-1815
Virginia Smith-Edmond	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, NY 10081 (212) 552-1815

Harold Cano	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, NY 10081 (212) 552-1815
Catharine Berliner	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, NY 10081 (212) 552-1815
Merrill Winter	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, NY 10081 (212) 552-1815

Dennis Robertson is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during some or all of the relevant time period, the employment, performance and job responsibilities of other relevant persons, if any, under his management and supervision during portions of the relevant time period, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

James Caruso is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during some or all of the relevant time period, the employment, performance and job responsibilities of other relevant persons, if any, under his management and supervision during portions of the relevant time period, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Virginia Smith-Edmond is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during portions of the relevant time period, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Harold Cano is likely to have knowledge of Plaintiff's contacts with AccessHR regarding her eligibility for retirement benefits, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Catharine Berliner is likely to have knowledge of relevant JPMorgan Chase benefits programs in effect during the relevant time period, and of Plaintiff's eligibility for such benefits.

Merrill Winter is likely to have knowledge of Plaintiff's contacts with Employee Relations regarding her eligibility for retirement benefits, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

B. Documents, data compilations, and tangible things that the disclosing party may use to support its claims and defenses:

- Plaintiff's employee records file, if any;

- Plaintiff's AccessHR file, if any;
- Relevant files, if any, maintained by JPMorgan Chase's Human Resources Department concerning Plaintiff and/or JPMorgan Chase's Retail Financial Services Consumer Banking New York Region;
- Relevant files, if any, maintained by JPMorgan Chase's Retail Financial Services Consumer Banking New York Region concerning Plaintiff and/or the New York Region;
- Relevant files, if any, maintained by any individual JPMorgan Chase manager or supervisor regarding Plaintiff;
- Relevant JPMorgan Chase Human Resources, retirement, and severance policies, plans, and programs;
- Relevant files, if any, maintained by any individual Retail Bank branch manager, district manager or supervisor regarding Plaintiff;
- Relevant files, if any, maintained by JPMorgan Chase's Employee Relations Department concerning Plaintiff;
- Relevant documentary communications, if any, whether in letter, memorandum, email, or other format;
- Relevant Human Resources policies;
- JPMorgan Chase & Co. Code of Conduct; and
- Relevant email communications.

C. The provisions of Fed. R. Civ. P. 26(a)(1)(C) are not applicable because Defendants are not seeking damages at this time from Plaintiff.

D. Defendants are investigating what, if any, insurance agreements may apply to Plaintiff's claims and will supplement its response as appropriate.

#### **RESERVATION OF RIGHTS**

Defendants reserve their right to supplement and/or amend their Rule 26 Disclosure Statement if and when they deem it appropriate.

Dated: June 4, 2008

**JPMORGAN CHASE LEGAL AND  
COMPLIANCE DEPARTMENT**

By: 

Frederic L. Lieberman, Esq.

Attorneys for Defendant

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New York, New York 10081

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New York, New York 10016  
(212) 489-8775

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PATRICIA A. McDONOUGH,	:	
	:	
Plaintiff,	:	ECF
	:	
- against -	:	08 Civ. 4429 (JSR) (FM)
	:	
JPMORGAN CHASE BANK, N.A., successor	:	
in interest to THE CHASE MANHATTAN BANK,	:	<b><u>CERTIFICATE OF SERVICE</u></b>
JPMORGAN CHASE & CO., JPMORGAN	:	
CHASE & CO. d/b/a JP MORGAN CHASE, N.A.,	:	
	:	
Defendants.	:	
	:	
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I hereby certify that on June 4, 2008 I caused a copy of the following documents:

**DEFENDANT'S RULE 26 DISCLOSURE STATEMENT,  
DEFENDANTS' FIRST SET OF INTERROGATORIES TO PLAINTIFF,  
DEFENDANTS' FIRST REQUEST TO PLAINTIFF  
FOR PRODUCTION OF DOCUMENTS,  
and  
NOTICE OF DEPOSITION**

to be served by first class mail directed to the attorney of plaintiff at the following address:

Brian McCaffrey, Esq.  
Leffler Marcus & McCaffrey LLC  
200 Madison Avenue, Suite 1901  
New York, New York 10016

Dated: June 4, 2008

  
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Frederic L. Lieberman (FL 9454)